

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

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DEC 29 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In re

Amendment of § 73.202(b),
Table of Allotments,
FM Broadcast Stations
(**Fredericksburg and
Helotes, Texas**)

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)
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MM Docket No. 94-125
RM-8534

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To: The Acting Chief, Allocations Branch,
Mass Media Bureau

COMMENTS AND CONTINGENT COUNTERPROPOSAL

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Date: December 29, 1994

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October Communications Group, Inc. ("OCG"), the licensee of radio station KONO-FM, herein comments on the Notice of Proposed Rule Making in this proceeding. OCG seeks to relicense KONO-FM from Fredericksburg, to Helotes, Texas, a growing, incorporated community about 20 miles northwest of downtown San Antonio. Helotes enjoys a broad spectrum of civic attributes, and like Fredericksburg, lies outside the nearest Census-Bureau-defined Urbanized Area, San Antonio. Both KONO-FM and KNAF(AM) serve Fredericksburg full time, but Helotes currently has **no** local service.

OCG herein addresses the staff's uncertainty that, "... [OCG's] proposal would result in a preferential rearrangement of allotments." OCG proves: that Helotes fully warrants a local service; that Helotes has a strong sense of local identity, many civic attributes, and is no mere appendage of the closest large city, San Antonio. OCG also shows that Helotes's position within the "Rand McNally San Antonio Metropolitan Area" is irrelevant, and that a first local service to Helotes outranks a second local full-time radio service to Fredericksburg. OCG also advances, on a contingent basis, an alternative proposal: the relicensing of KONO-FM to Castroville, another deserving but unserved community. Castroville lies outside the Rand McNally San Antonio Metropolitan Area.

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To: The Acting Chief, Allocations Branch,
Mass Media Bureau

COMMENTS AND CONTINGENT COUNTERPROPOSAL

October Communications Group, Inc. ("OCG"), the licensee of radio station KONO-FM, hereby comments on and advances its Contingent Counterproposal to the Notice of Proposed Rule Making, DA 94-1202 (released November 7, 1994) ("NPRM") in this proceeding.

I. BACKGROUND

1. OCG seeks, through rule making, to relicense KONO-FM from Fredericksburg, Texas to Helotes, Texas. Schematically, OCG proposes:

<u>Community</u>	<u>Present</u>	<u>Proposal</u>
Fredericksburg	266C	- - -
Helotes	---	266C

2. Helotes is a growing, incorporated community with a 1990 Census population of 1535, about 20 miles northwest of downtown San Antonio. OCG has already shown that Helotes enjoys a broad spectrum of civic attributes. And like Fredericksburg, Helotes lies outside the nearest Census-Bureau-defined Urbanized Area, San Antonio.¹ Both KONO-FM and KNAF(AM) serve Fredericksburg full time,² but Helotes currently has **no** local service.

3. Despite Helotes's merits and lack of service, the staff is unsure that "... [OCG's] proposal would result in a preferential rearrangement of allotments." Why? Because Helotes is within the "Rand McNally San Antonio Metropolitan Area," and the staff deems Helotes to be

¹ Fredericksburg is a bit further northwest of San Antonio than Helotes, and somewhat larger.

² KNAF operates on 910 kHz with 1000 watts of daytime power and 174 watts at night. The station's daytime 5-mV/m groundwave contour and its nighttime interference-free contour both fully encompass Fredericksburg. See Exhibit A, the Declaration of John Furr, OCG's Technical Consultant. Fredericksburg also has a vhf television allotment (Channel 2) for which an Administrative Law Judge has initially selected a permittee. Exceptions by several competing applicants are pending.

"well served by at least five aural reception services."

4. KONO-FM's licensed site is fully spaced and close enough to Helotes for full city-grade coverage, so the site meets FCC standards for an allotment reference point.³ OCG accordingly specified it. Nonetheless, citing Van Wert, Ohio and Monroeville, Indiana, 7 F.C.C. Rcd 6519 (1992), the NPRM claims, "... there would be no improvement in the service already provided by Station KONO-FM...."

II. ARGUMENT

A. The Staff Must Adopt OCG's Helotes Proposal As A Preferential Rearrangement of Allotments

1. Helotes Deserves A Local Service

5. The staff must promptly approve OCG's proposal. Helotes prima facie satisfies FCC standards for a licensable community. Pierce, Texas et al., 8 FCC Rcd 3528 (M.M. Bur. 1993); Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 101 (1982). And Helotes's position within the Rand McNally San Antonio Metropolitan Area is irrelevant.

³ See, e.g., Lyndon, Vermont, 49 Rad. Reg. (P & F) 2d 703, 707 (B.Bur. 1981); Murphy, North Carolina, 37 Rad. Reg. (P & F) 2d 837, 838 (B.Bur. 1976); recons. den., 39 Rad. Reg. (P & F) 2d 932 (B.Bur. 1977); Batavia, New York, 16 Rad. Reg. (P & F) 2d 1654, 1655 (1969); Lafayette, Georgia, 4 FCC 2d 887 (1969); Rock Hill, S. C., 5 Rad. Reg. (P & F) 2d 1564 (1965).

Policies and Procedures, 90 FCC 2d 88, 101 (1982). And Helotes's position within the Rand McNally San Antonio Metropolitan Area is irrelevant.

6. In weighing OCG's proposal, the staff must honor the mandate of Congress, set forth in § 307(b) of the Communications Act:

In considering applications for licenses, and modifications and renewals thereof, when and insofar as there is a demand for the same, the Commission shall make such distribution of licenses, frequencies, hours of operation, and of power among the several States and communities as to provide a fair, efficient, and equitable distribution of radio service to each of the same.

47 U.S.C. § 307(b). In furtherance of that duty, the FCC, via Revision of FM Assignment Policies and Procedures, set the following priorities:

- first aural service;
- second aural service;
- first local service; and
- other public-interest matters.⁴

OCG's proposed first local service to Helotes clearly outranks second local service to Fredericksburg.⁵

⁴ Second aural service and first local service rank coequally. Other public-interest matters include second local service, more efficient use of the spectrum, etc.

⁵ "The allotment of Channel 243A to Seneca, as its second full-time and first competitive service, while worthy in itself, also would not provide service to any unserved or underserved areas or a first local service." Greenwood, South Carolina et al., 63 Rad. Reg (P & F) 2d at 258.

member City Council. Helotes provides its own Police and Fire protection, and has a wide array of businesses, places of worship, and chapters of nonprofit social and community-service groups.⁶ The community is, for example, home to John Floore's Country Store, a country-music and dance hall renowned as the site of Willie Nelson's first public performance. Floore's can accommodate a total of about 1500 people, almost the entire 1990 Census population of Helotes. Many people thus come to Helotes from elsewhere for entertainment.

8. Many outsiders also attend the four-day Helotes Cornyval, held on fairgrounds owned by the 21-member Helotes Festival Association. Cornyval can draw approximately 100,000 visitors each Spring for a parade, rodeo, musical performances, food booths, and crafts displays. The Helotes Optimist Club's Classy Chassis Car Show also draws several thousand visitors one day each September. Exhibit B hereto lists other local public functions that enrich the lives of Helotes's residents.

⁶ Helotes formerly provided its own water service. Water now comes from San Antonio Water Systems, a large water utility which bought the municipal system about 20 years ago. Electricity comes from San Antonio Public Service. Grey Forest Utility Company, owned by the nearby community of Grey Forest, supplies natural gas to Helotes.

9. The people of Helotes definitely consider themselves a community separate and apart from San Antonio. See Exhibit C. The town has its own Chamber of Commerce and weekly newspaper, The Echo. Many local businesses advertise in The Echo because they are priced out of San Antonio media outlets. Southwestern Bell, the "Baby Bell" which provides telephone service, publishes a separate Helotes telephone directory. See Exhibit D. Helotes has its own Post Office and zip code (78023), and the Post Office intends to build a new, larger facility there.

10. The town currently has a pediatric-care facility and a medical-supply outlet. A general-care outpatient medical clinic is scheduled to open early next month. Also, the Texas American Bank (formerly the Bank of Leon Springs) has headquarters in Helotes and branches elsewhere. While most of Helotes's work force commutes elsewhere (particularly to military bases), the same is true of many towns already enjoying local service.

11. OCG recognizes that the FCC has reserved the right to flexibility in allotment proceedings -- where circumstances warrant. Modification of License I, 4 FCC Rcd at 4873 (1989), recons. den., Modification of License II, 5 FCC Rcd 7094 (1990). And OCG knows that:

The public has a legitimate expectation that existing service will continue, and this expectation is a factor we must weigh independently against the service benefits that may result from reallocoting of a channel from one community to another, regardless of whether the service removed constitutes a transmission service, a reception service, or both.

Modification of License II.

12. But here, nothing justifies departure from the 1982 Revision Order's priorities. Converting **one** of Fredericksburg's local services into the only service bound to address Helotes's needs poses no public-interest dilemma. For as the FCC has so aptly stated, the people of Helotes have the right to expect that, once local service commenced, that service would continue.⁷ In the recent past, station KXAM served Helotes on 1440 kHz. But KXAM succumbed to market forces hostile to AM outlets. At the station's request, the FCC canceled KXAM's authorization. See File Nos. BP-830801AM, as modified, and BL-870807AF.⁸ OCG seeks to fulfill Helotes's legitimate expectation and to **restore** local service to the town

⁷ Modification of License II.

⁸ Ref. No. 8910-MCS (released December 9, 1988).

via FM, which will ensure the transmission service's long-term viability.⁹

13. Helotes does enjoy reception service from San Antonio stations. But that is truly irrelevant. Service from nearby cities is **no substitute** for **local** service. Conklin, New York, 5 FCC Rcd 1104 (1990); Tallahassee, Florida et al., 3 FCC Rcd 5542 (1988); State College, Pennsylvania et al., 2 FCC Rcd 3909 (1987); Greenwood, South Carolina et al., 63 Rad. Reg. (P & F) 2d 251, 257-258 (M.M. Bur. 1987).¹⁰ Were it otherwise, there would be no point in licensing a station to any particular

⁹ KXAM had daytime-only facilities, for which one may no longer apply. Per Exhibit A, no new full-time AM service to Helotes will satisfy current FCC licensing standards. No vacant FM channel meets FCC allotment criteria. Helotes can again enjoy local service **only** through a station relicensing from another community.

¹⁰ "While many parties contend that Biltmore Forest is already well served by the Asheville stations, the Commission has held on numerous occasions that service from stations located outside the community cannot be a substitute for local service. We also find the argument that the allotment would in reality be just another Asheville public service to be without merit. See Clinton, La., 45 RR 2d 1587 (1979) and Westover and Grafton, W.V., 46 FR 10737, published February 4, 1981."

community. But the focus of localism, the cornerstone of the broadcast-licensing structure, is **transmission** service to worthy communities.¹¹

2. The Authority Cited By the Staff Is Inapposite

14. The NPRM cites only Van Wert as authority for the staff's ambivalence about the merits of OCG's proposal, but Van Wert does not control here. A Van Wert station sought to relicense to Monroeville, a town one-eighth the size. A Fort Wayne licensee objected, arguing that Monroeville was: within the "Fort Wayne Metropolitan Area;" only eight miles from; and a "bedroom community" of Fort Wayne. Van Wert had AM and FM local daytime service, but only FM service at night. 7 FCC Rcd at

¹¹ **Any** station may air public-affairs programs specially for **any** town in which it has listeners -- so long as the station does not shortchange its home community in the process. But **no station**, licensed elsewhere, even one addressing issues of a town lacking local service, can fill the special void in that community. Greenwood, supra. KONO-FM's present 70-dBu coverage of Helotes is thus irrelevant. And the statement that OCG proposes "... no improvement in the service already provided by Station KONO-FM" to Helotes is far too narrow. OCG intends to provide Helotes with a local service once more -- something no station can presently do. Finally, even if, arguendo, as the staff posits, KONO-FM can now provide special programming to Helotes sufficient to take the place of a local service, KONO-FM, relicensed to Helotes, could just as well air public-affairs programs for Fredericksburg to prevent any shortfall in service there. If the staff's hypothesis presents no public-interest drawbacks, OCG's proposal doesn't either.

6520. On balance, the staff found that creating a first local service to Monroeville did not justify ending Van Wert's only local nighttime service.

15. The facts here are starkly different. Other than the channel which would have been removed, Van Wert had no local nighttime service. Van Wert also had no television allotment. By contrast, Fredericksburg has **both**.¹² Nothing in Van Wert suggests that Monroeville had any dynamic local character, but Helotes clearly is a growing, vibrant community with an usually wide array of civic attributes. Finally, Helotes is considerably removed from San Antonio, and twice as close in size to Fredericksburg (1:4) as Monroeville was to Van Wert (only 1:8).

16. Van Wert cites Plainview Radio et al., 24 FCC 405 (1958) to justify maintaining second local service to Van Wert over creating a first local service to Monroeville.¹³ However, for two reasons, Plainview is inapposite. First and foremost, the Circuit Court vacated the cited

¹² Radio receivers that can also reproduce the sound portion of television broadcasts are now widely available, from Radio Shack stores and other outlets. Hand-held television receivers such as the Sony Watchman® models are also available at relatively modest cost and are becoming increasingly popular. These trends accentuate the importance of Fredericksburg's vhf television allotment as a means of providing local service. The presence of Channel 2 in addition to Fredericksburg's full-time AM service will ensure adequate coverage of local issues and needs.

¹³ 7 FCC Rcd at 6521, n.10.

Plainview decision, chiding the FCC for finding, without the support of “substantial evidence,” the need for a second local service greater than that for a first local service. Harrell v. FCC, 267 F.2d 629 (1959).

Second, the factual differences are immense. The new, first local service in Plainview would have created new interference, “... a substantial factor to be weighed against the advantage of a first [local] service.” 24 FCC at 423. By contrast, KONO-FM’s restored, first local service to Helotes would entail **no** interference. The unserved community in Plainview was within the area the FCC then used in Huntington analyses.¹⁴ Helotes is not in the Census Bureau’s San Antonio Urbanized Area, now the yardstick for Huntington purposes. Faye and Richard Tuck, 3 FCC Rcd 5374 (1988).

3. The Rand-McNally Metro Area Is Irrelevant

17. The NPRM’s reference to Rand-McNally’s San Antonio Metropolitan Area is irrelevant. In Faye and Richard Tuck, the Commission

¹⁴ Huntington Broadcasting Company, 5 Rad. Reg. (P & F) 721, rehearing den., 14 F.C.C. 563 (1950), aff’d, 192 F.2d 33 (D.C. Cir. 1951). “The Huntington doctrine recognizes that, for proposals involving high-power frequencies, where a suburban community is so closely integrated with a central city that it is a mere appendage of the urbanized area, it should not be considered a separate community for purposes of section 307(b). * * * Huntington is the exception, and 307(b) the rule.” New Radio Corp. v. FCC, 804 F.2d 756, 759 (D.C. Cir. 1986).

carefully considered, as a new Huntington yardstick, the Census Bureau's SMSA. But the FCC rejected it -- and for good reason.

The Census Bureau defines an Urbanized Area as a "separation of urban and rural population in the vicinity of the larger cities." Metropolitan Areas, 48 Fed. Reg. 19428.... The criteria for an Urbanized Area are: (a) a central city of 50,000 inhabitants or more; or (b) twin cities, that is, cities with contiguous boundaries with a combined population of at least 15,000; or (c) surrounding incorporated communities of 2500 or more or areas of an urban nature based on population density and land utilization. Id. On the other hand, the Census Bureau defines an SMSA as being made up of a county or a group of contiguous counties surrounding a city of 50,000 or more population. Id.

Thus, the Census Bureau's SMSA concept encompasses a larger area than its Urbanized Area definition, and it may include considerable amounts of rural territory that lie outside the Urbanized Area.

Adopting the broader SMSA concept as the standard for a metropolitan area community in section 307(b) cases would effectively mean that, regardless of its relationship to the central city, no community in a densely populated area, such as the California Coast from Los Angeles County to the Mexican border, could ever receive a preference on section 307(b) grounds.

*

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*

Because the Census Bureau's Urbanized Area encompasses far less territory than the broader SMSA, we find that the Urbanized Area more accurately defines a metropolitan area "community" for section 307(b) purposes. As Huntington is a very limited exception to section 307(b), we are ever wary of extending it beyond the doctrine's original premises concerning the overlapping transmission needs of a central city and its contiguous suburbs.

*

*

*

In concluding that Urbanized Area is relevant in Huntington determinations but that SMSA is not..., [w]e hold only ... that Huntington does not automatically encompass all communities within the SMSA. In other words, a party may not rely on a community's location within the SMSA to meet its burden of showing that the community is an integral part of a homogenous metropolitan area. Rather, the party seeking to have us apply Huntington to a community outside the Urbanized Area must affirmatively show that there is sufficient dependence on the central city to support a public interest finding that the given community's local transmission needs can be adequately satisfied by stations licensed to other communities within the larger metropolitan area.

3 FCC Rcd at 5379-5380.

18. According to the Rand-McNally Commercial Atlas (1994), at p. 97, each RMMA comprises a central city (sometimes two central cities) together with what **Rand McNally** considers to be its suburbs and satellite communities, whose economic and social life is tied to the central city or cities. There are two principal criteria for inclusion in an RMMA: population density of at least 70 people/mile²; and at least 20% of the labor force commuting to the RMMA's central urban area. RMMAs are **not** restricted to following county boundaries, as SMSAs are.

19. One could interpret the NPRM's reference to the San Antonio RMMA as an attempt to supplant the use of Urbanized Areas in Huntington analyses with the use of RMMAs. If that is the aim, it is plainly

misguided. Tuck directly limits Huntington considerations to Urbanized Areas -- unless someone first makes an affirmative showing of "sufficient dependence on the central city to support a... finding that the given community's local transmission needs can be adequately satisfied by stations licensed to other communities within the larger metropolitan area."¹⁵ Here, no one has made any such affirmative showing, and OCG has established the opposite. Moreover, the RMMA is even broader in concept than the SMSA, which Faye and Richard Tuck directly rejected.

20. The Circuit Court has refused "... to extend the [Huntington] policy to other contexts absent a convincing demonstration that such an extension is necessary to satisfy the minimum requirements of rationality." Beaufort County Broadcasting Co. v. FCC, 787 F.2d 645, 654 (D.C. Cir. 1986). The Court has also limited Huntington's application to "exceptional' circumstances,"¹⁶ and has faulted the FCC for denying a first-local-service preference in the absence of "substantial evidence" that a dominant city's stations could satisfy a smaller, contiguous town's need for transmission service. E.g., Harrell v. FCC. Finally, the FCC has

¹⁵ See also, Bowdon et al., Georgia, 6 FCC Rcd 4863, 4864 n.12.

¹⁶ Beaufort County, 787 F.2d at 651.

granted requests to relicense stations from communities outside the nearest RMMA to towns within the RMMA without any hesitation -- or even any mention of that fact, even though the locality to lose service would retain just one **daytime-only** AM facility (KYOO), and even though residents protested the relicensing. See, e.g., Bolivar and Nixa, Missouri, DA 91-740, M.M. Docket 90-485 (rel. June 25, 1991), and Exhibit E hereto. The FCC may not subject OCG to disparate treatment. Melody Music v. FCC, 345 F.2d 730, 733 (D.C. Cir. 1965).

4. OCG Aims To Provide Local Service to Helotes

21. Recent developments have resulted in increased service to Fredericksburg. For example, although radio station KFAN(FM), Channel 300C2, is licensed to Johnson City, Texas, the station provides full 70-dBu service to Fredericksburg and has established its main studio in that community. The level of service will also increase when Channel 2 signs on. For both these reasons and the need for restored local service to Helotes, OCG seeks to relicense KONO-FM to the latter community. OCG intends to fulfill its responsibility as a Helotes licensee by providing a local service to that community. OCG intends to air a weekly 30-

minute public affairs program addressing the unique issues facing Helotes. OCG also intends a minimum of five separate public-service campaigns monthly to ensure adequate exposure of charitable and civic activities in Helotes. See Exhibit F. These efforts will fill the great void for broadcast service currently at Helotes.

**B. Alternatively, The FCC Must Adopt OCG's
Contingent Counterproposal, Advanced Herein
-- Relicensing KONO-FM To Castroville, Texas --
As A Preferential Rearrangement of Allotments**

22. OCG is fully committed to prosecuting its original petition to relicense KONO-FM to Helotes, and is firmly convinced of the merits of that proposal. But if the staff remains uncertain as to those merits, given the advent of new service in Fredericksburg, OCG hereby reluctantly and contingently advances a Counterproposal: to relicense KONO-FM to the community of Castroville, Texas.

23. Castroville is outside the San Antonio RMMA. Castroville also has many of the same attributes as Helotes, and the similar immediate needs for transmission service, but has a larger 1990 Census population (1821 vs. 1409). According to the Rand-McNally Commercial Atlas, Castroville is incorporated, has local banking, and its own zip code. Castroville also has a unique history. Founded by Henri Castro of France, its original inhabitants were Alsatian French

colonists. See Exhibit G. There are several public-service organizations, seven churches in Castroville, public Elementary, Intermediate, Junior High and High Schools, and a parochial Elementary School. See Exhibit H.

24. Castroville has an elected government with its own Mayor and city council, its own professional police department, and volunteer fire protection. Castroville has a municipal airport, commercial bus service, newspaper, three banks, a Chamber of Commerce, a telephone directory, and its own electric-, water-, and natural-gas supply systems.

Castroville also has and exercises local taxing authority. A total of 541 people work in Castroville. See Exhibit I.

25. Because of the background of its settlers and the architecture of its original buildings, Castroville is known as the "Little Alsace of Texas." See Exhibit J. There are a number of Alsatian and French restaurants in Castroville, as well as lodging accommodations. See Exhibit K. The town has a number of Antique stores and produces two Antique shows each year. See Exhibit L. The entire old part of Castroville is a National Historic District. See Exhibit M. Castroville also has an active Garden Club and renowned commercial greenhouses. See Exhibit N. Clearly, Castroville warrants a local service. Revision of FM Assignment

Policies and Procedures, supra. But Castroville currently lacks any such service, and filling that void would serve the public interest. Id.

I. Finally, KONO-FM's licensed site meets the FCC's criteria for a reference point for Channel 266C at Castroville. See Exhibit A.

C. Other Matters

II. OCG desires to start filling the present unmet need for local service at Helotes (or in the alternative at Castroville) as soon as possible. OCG thus intends, upon the grant of either OCG's Helotes proposal or OCG's contingent Castroville Counterproposal, to promptly apply for a construction permit specifying the new community. OCG intends to then promptly implement the resulting construction permit, to operate, and to seek a license for the improved KONO-FM facility.

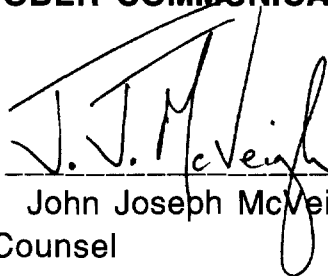
III. CONCLUSION

For the reasons stated, the staff must relicense KONO-FM to Helotes or to Castroville as OCG has proposed.

Respectfully submitted,

OCTOBER COMMUNICATIONS GROUP, INC.

By

A handwritten signature in black ink, appearing to read "J. J. McVeigh", is written over a horizontal line.

John Joseph McVeigh

Its Counsel

Multinational Legal Services, P.C.
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Date: December 29, 1994

EXHIBIT A

**THE FOLLOWING DECLARATION IS A FACSIMILE.
THE ORIGINAL IS IN TRANSIT AND WILL BE FILED UPON RECEIPT.**

TECHNICAL NARRATIVE

This technical showing is prepared to support October Communications Group, Inc.'s request to change city of license of KONO-FM from Fredericksburg, Texas to Helotes, Texas as given in MM Docket 94-125 (RM-8534).

Exhibit A-1 demonstrates that KNAF's 910 kHz operations serves the entire city of Fredericksburg, Texas both day (5 mV/m) and nighttime (interference-free). The nighttime interference-free level of 13.4 mV/m was determined by 50% exclusion with the sole contributor of KXEB (910 kHz) in Sherman, Texas.

Exhibit A-2 shows the current authorized (licensed) 60 dBu service over San Antonio and that the entire city limits is covered (indicated by dashed line). The allocation maximum contour distance for a Class C is 91.8 km and is shown as the solid line with increased coverage.

Exhibit A-3 shows the five FM aural services providing 60 dBu service to Fredericksburg, Texas. There were 13 AM stations which also served Fredericksburg with 0.5 mV/m or greater (including KNAF shown in Exhibit A-1). This demonstrates that Fredericksburg is well served with five or more aural services.

Exhibit A-4 verifies the contingent counterproposal. From the licensed (reference) coordinates, the 70 dBu contour (67.7 km) serves the entire city of Castroville, Texas.

My qualifications area matter of record with the FCC. The above information and attached exhibits of Exhibit A are true and correct according to my knowledge and belief.

December 29, 1994


John R. Furr

JF&A
COMMUNICATIONS
CONSULTANTS

NARRATIVE

KONO-FM
HELOTES, TX
EXHIBIT A